

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

EPHRAIM ROSENBERG,

Defendant.

NO. CR 20-151 RAJ

STIPULATED MOTION TO RETURN
PASSPORT AND EXONERATE
PRETRIAL RELEASE ORDER

NOTING DATE: AUGUST 30, 2024

I. IDENTITY OF MOVING PARTY

The defendant Ephraim Rosenberg, by his attorney Peter Offenbecher, requests the relief set forth below.

II. RELIEF REQUESTED

Exoneration of the pretrial order setting conditions of release, and permission for defense counsel to return Mr. Rosenberg's passport to him.

III. DISCUSSION

In 2023 Mr. Rosenberg plead guilty to one count of conspiracy to commit a violation of the Travel Act, 18 U.S.C. § 1952(a)(3). At sentencing, the Government, the defense, and the United States Probation Department jointly recommended that a sentence of two years'

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ORDER – 1

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1 probation with one year of home confinement be imposed; the Court agreed and adopted the
2 joint recommendation. The Judgment was entered July 14, 2023. Dkt. 199 at 3–4.

3 Mr. Rosenberg began his two-year term of probation on July 14, 2023, and was placed
4 on home detention and location monitoring on July 17, 2023. Mr. Rosenberg successfully
5 completed the home detention portion of his probationary sentence and is in full compliance
6 with the other terms of his probation, which is now more than half complete.

7 A condition of Mr. Rosenberg’s pretrial conditions of release order was that his New
8 York counsel retain his passport. Since Mr. Rosenberg has reported for, and is serving, the
9 imposed sentence, the pretrial release order has been—or should now be if it is not already—
10 exonerated.

11 The United States Probation Officer supervising Mr. Rosenberg in the Eastern District
12 of New York has communicated her consent to the return of his passport.

13 I have communicated with Assistant United States Attorney Miriam Hinman, counsel
14 for the government in this matter, who indicates that the government has no objection.

15 We therefore respectfully request that the Court exonerate the pretrial order setting
16 conditions of release and permit his New York counsel to return his passport to him.

17 **IV. CONCLUSION**

18 The Court should enter an Order directing that the order setting conditions of release be
19 exonerated, and that Mr. Rosenberg’s New York counsel be permitted to return his passport to
20 him.

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RESPECTFULLY SUBMITTED this 30th day of August 2024.

s/ Peter Offenbecher

Peter Offenbecher

Skellenger Bender, P.S.

s/ Miriam Hinman

Miriam Hinman

Assistant United States Attorneys

Jacob Laufer

Jacob Laufer, P.S.

Counsel for Defendant Rosenberg